

AUG 22 2002

CV 01-05124 #00000068

The Honorable Robert J Bryan

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

JOHN S TEMPLE,

Plaintiff,

v

ALLSTATE INSURANCE COMPANY, a  
foreign Corporation,

Defendant

No CO1- 5124 RJB

**PLAINTIFF'S EXHIBITS  
IN SUPPORT OF MOTION FOR  
PARTIAL SUMMARY JUDGMENT**

**PLAINTIFF'S EXHIBITS**

Attached hereto are Plaintiff's Exhibits 1-42 offered in support of Plaintiff John  
Stephen Temple's Motion for Partial Summary Judgment.

Exhibit 1 "Preparing for the Future" Booklet

Exhibit 2 May 24, 2000 letter from Daryl Page, Allstate Field Vice  
President

- Exhibit 3 General Release and Waiver Agreement
- Exhibit 4 "Preparing for the Future" Q & A Confidentiality and Non-Compete
- Exhibit 5 Steve Temple's Agent Employment and Non-Compete Agreement
- Exhibit 6 May 7, 1998 Letter from Rollie Poulter
- Exhibit 7 August 25, 1998 Letter from Rollie Poulter
- Exhibit 8 Documents Describing Program at Olympic Memorial Hospital
- Exhibit 9 "Telling It Straight" – August 31, 1998
- Exhibit 10 Request from Lisa Temple – November 17, 1998
- Exhibit 11 Allstate Discussion re CA Agents Lawsuit - January 8, 1996
- Exhibit 12 Two (2) page letter from Steve Crosby to Penny Watson re Accommodation
- Exhibit 13 June 9, 1999 DOL Wage and Hour Division Letter to Allstate
- Exhibit 14 Allstate Voluntary R3001 Exclusive Agency Agreement and Non-Compete Agreement
- Exhibit 15 June 17, 2002 Report of Andrea Jacobson, M.D , Ph D
- Exhibit 16 November 5, 1998 Seattle Heart Clinic Notice re John Temple Disabilities
- Exhibit 17 April 16, 1999 Letter from Lisa Temple with Handwritten Notes from Rob Fowler
- Exhibit 18 April 13, 1999 Letter from Steve Temple with Attachments
- Exhibit 19 August 11, 1999 Letter from Debbie Cooper
- Exhibit 20 January 18, 2000 Letter from Tim Plohg, Field Vice President
- Exhibit 21 January 6, 1999 Letter from Olsen Staffing Services

- 1 Exhibit 22 Defendant Allstate's Responses to Plaintiff's First Requests
- 2 for Admissions in the matter of *Hogan v Allstate*
- 3
- 4 Exhibit 23 February 24, 1999 Letter from Steve Temple
- 5
- 6 Exhibit 24 May 24, 2000 Letter from Lisa Temple
- 7
- 8 Exhibit 25 Allstate Letters to Montana and West Virginia Agents
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- 10 Exhibit 26 Report of Eugene Silberberg, Ph D , of June 4, 2002
- 11
- 12 Exhibit 27 Allstate's Answers to Plaintiff's First Request for Admissions Nos
- 13 12, 14
- 14
- 15 Exhibit 28 Defendant's Answer to Interrogatory No 23
- 16
- 17 Exhibit 29 Answer to Second Amended Complaint
- 18
- 19 Exhibit 30 November 16, 1999 Notice Regarding the "Preparing for the Future"
- 20 Conversion Packet Documents
- 21
- 22 Exhibit 31 R3001 EA Conversion Analysis
- 23
- 24 Exhibit 32 IRS Closing Agreement dated September 4, 1999
- 25
- 26 Exhibit 33 "Direct Express" March 10, 1999
- 27
- 28 Exhibit 34 "Stalked by Allstate," *Fortune*, New York; October 2, 1995,
- 29 Behar, Richard
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- 31 Exhibit 35 "Allstate Slapped ," *Fortune*, New York, October 30, 1995,
- 32 Behar, Richard
- 33
- 34 Exhibit 36 May 2, 2000 Letter from EEOC to Allstate
- 35
- 36 Exhibit 37 November 16, 1999 Allstate Document "Age Discrimination in
- 37 Employment ("ADA") Waiver Information"
- 38
- 39 Exhibit 38 Excerpts from "The Allstate Corporation 1995 Annual Report"
- 40 (pages 47 and 69)
- 41
- 42 Exhibit 39 November 16, 1999 Allstate Survey "Employee Agent
- 43 Overnight Telephone Survey"
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1 Exhibit 40 Defendant's Allstate's Supplemental Response to Plaintiff's  
2 Interrogatories 6 and 12

3 Exhibit 41 March 12, 1999 letter from Lisa Temple (without attachments)  
4 with handwritten notations by Rob Fowler  
5

6  
7 Exhibit 42 July 12, 1999 letter from Lisa Temple  
8

9 Each of the above documents is a true and correct copy of a document received or  
10  
11 created by Allstate Insurance Co , John Stephen Temple, and/or Lisa Temple as  
12  
13 authenticated in the Declarations Scott C G Blankenship, John S Temple, and Lisa Temple  
14  
15

16  
17 Signed at Seattle, Washington, this 20<sup>th</sup> day of August, 2002  
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19

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21  
22 By   
23

24 Beth A Barrett  
25 WSBA No 31702  
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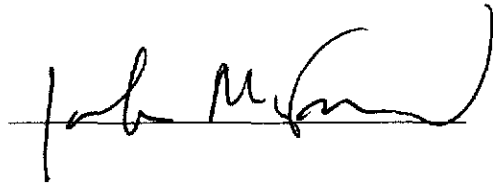
**DECLARATION OF SERVICE**

The undersigned hereby declares under penalty of perjury under the laws of the State of Washington that, on the below date, I mailed or caused delivery of a true copy of this document to

Karen Jones  
Riddell Williams, P S  
1001 Fourth Avenue Plaza, Suite 4500  
Seattle, WA 98154-1065

at her regular office

DATED this 20<sup>th</sup> day of August, 2002, at Seattle, Washington



ATTACHMENTS

NOT SCANNED